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7 Attorneys for Judgment Creditor  
JASON FRANK LAW, PLC  
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10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
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13 In re  
14 EAGAN AVENATTI, LLP,  
15 Debtor.

16 Case No. 8:18-CV-01644-VAP-KES  
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**JOINT STIPULATION RE APPOINTMENT  
OF RECEIVER AND RESTRAINING  
ORDER**

[*Proposed*] Order Filed Concurrently herewith]

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## **STIPULATION**

This Stipulation is entered into by and between Judgment Debtor Eagan Avenatti, LLP (“EA”) and Michael Avenatti (“Avenatti”), on the one hand, and Judgment Creditor Jason Frank Law, PLC (“JFL”), on the other hand (collectively, the “Parties”).

WHEREAS, JFL has a judgment against EA in the amount of \$10,000,000.00, plus accruing interest at \$564.38 per day (since May 22, 2018) and reasonable attorney fees and costs incurred by JFL in enforcing the judgment (the “Judgment”);

WHEREAS, on February 7, 2019, this Court ordered EA and Avenatti to appear for a judgment debtor examination on February 14, 2019 at 9:30 a.m. in Courtroom 6D of this Court (Doc. 50);

WHEREAS, on February 12, 2019, JFL filed a Motion for Appointment of Receiver and Restraining Order (“Motion”) (Doc. No. 51);

WHEREAS, EA and Avenatti have stipulated and agreed to the relief requested in the Motion and have further agreed that the Magistrate Judge Karen E. Scott shall have the jurisdiction and authority to enter the [Proposed] Order Appointing Receiver and Issuing Restraining Order (the “Order”) filed concurrently herewith; and

WHEREAS, upon entry of the Order, JFL has agreed to withdraw the Motion and all pleadings and exhibits relating thereto and consent to the rescheduling of the judgment debtor examination to March 8, 2019 at 9:30 a.m. in Courtroom 6D of this Court.

ACCORDINGLY, the Parties stipulate and agree as follows:

1. The Parties, and each of them, stipulate to the terms of the Order;
  2. The Parties, and each of them consent to the jurisdiction of the Magistrate Judge Karen E. Scott to enter the Order and to supervise the Receivership;
  3. Upon entry of the Order, the Motion is deemed withdrawn without prejudice; and
  4. Upon entry of the Order, the judgment debtor exam of EA and Avenatti is continued to March 8, 2019 at 9:30 a.m. in Courtroom 6D of this Court, located at 411 W. 4th Street, Santa Ana, California 92701.

1 IT IS SO STIPULATED  
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3 Dated: February 13, 2019

FRANK SIMS & STOLPER LLP

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By: /s/ Scott H. Sims  
Scott Sims, Esq.  
Attorneys for Judgment Creditor  
Jason Frank Law, PLC

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Dated: February 13, 2019

EAGAN AVENATTI, LLP

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By: \_\_\_\_\_

Managing Partner  
Judgment Debtor Eagan Avenatti, LLP

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Dated: February 13, 2019

MICHAEL J AVENATTI

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By: \_\_\_\_\_

Michael J. Avenatti  
In his Personal Capacity

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